

1 DENNIS L. KENNEDY  
2 Nevada Bar No. 1462  
3 JOSEPH A. LIEBMAN  
4 Nevada Bar No. 10125  
5 JOSHUA P. GILMORE  
6 Nevada Bar No. 11576  
7 **BAILEY♦KENNEDY**  
8 8984 Spanish Ridge Avenue  
9 Las Vegas, Nevada 89148-1302  
10 Telephone: 702.562.8820  
11 Facsimile: 702.562.8821  
12 DKennedy@BaileyKennedy.com  
13 JLiebman@BaileyKennedy.com  
14 JGilmore@BaileyKennedy.com

15 *Attorneys for Defendants & Counterclaimant*  
16 RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,  
17 M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI  
18 R. SHAH, MD, LTD.; and RADAR  
19 MEDICAL GROUP, LLP dba UNIVERSITY  
20 URGENT CARE

21 UNITED STATES DISTRICT COURT  
22 DISTRICT OF NEVADA

23 ALLSTATE INSURANCE COMPANY,  
24 ALLSTATE PROPERTY & CASUALTY  
25 INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

26 Plaintiffs,

27 vs.

28 RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,  
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI  
R. SHAH, MD, LTD.; and RADAR MEDICAL  
GROUP, LLP dba UNIVERSITY URGENT  
CARE, Does 1-100, and ROES 101-200,

29 Defendants.

30 AND RELATED CLAIMS.

31 Case No. 2:15-cv-01786-APG-CWH

32 **STIPULATION AND ORDER TO  
33 EXTEND DEADLINE FOR  
34 DEFENDANTS' OPPOSITION TO  
35 PLAINTIFFS' MOTION FOR  
36 SANCTIONS PURSUANT TO FRCP 11**

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and  
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR  
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD.,  
6 and DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of  
7 record, stipulate and agree as follows:

8 1. On March 16, 2018, the Allstate Parties filed their Motion for Sanctions Pursuant to  
9 FRCP 11 [ECF No. 263] (the “Motion”);

10 2. The Radar Parties presently have until March 30, 2018 to file their Opposition to the  
11 Motion. In order to fully address the issues presented, and due to scheduling conflicts for the Radar  
12 Parties’ counsel, including the fact that a member of the Radar Parties’ counsel will be out of town  
13 from March 30, 2018 until April 7, 2018, the Radar Parties shall now have up to and including April  
14 13, 2018 to file their Opposition to the Motion; and

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BAILEY♦KENNEDY  
8984 SPANISH RIDGE AVENUE  
LAS VEGAS, NEVADA 89143-1302  
702.562.8820

1       3.     This is the first stipulation to extend the deadline to file the Opposition to the Motion.  
2     This stipulation is made in good faith and not to delay the proceedings.

3           IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

4     DATED this 27<sup>th</sup> day of March, 2018.

5     McCORMICK, BARSTOW, SHEPPARD,  
6     WAYTE & CARRUTH LLP

7     By:    /s/ Todd W. Baxter  
8           DYLAN P. TODD  
9           TODD W. BAXTER  
10          8337 West Sunset Road, Suite 350  
11          Las Vegas, NV 89113

10        ERON Z. CANNON  
11        FAIN ANDERSON VANDERHOEF  
12        ROSENDAHL O'HALLORAN  
13        SPILLANE PLLC  
14        701 Fifth Avenue, Suite 4750  
15        Seattle, WA 98104

16        *Attorneys for Plaintiffs/Counterdefendants*

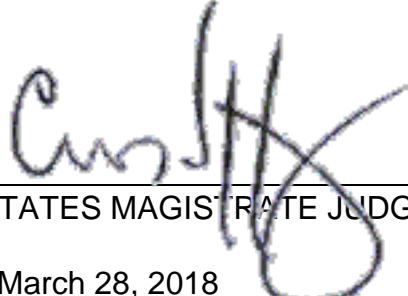
17        **IT IS SO ORDERED.**

18        DATED this 27<sup>th</sup> day of March, 2018.

19           BAILEY♦KENNEDY

20     By:    /s/ Joshua P. Gilmore  
21           DENNIS L. KENNEDY  
22           JOSEPH A. LIEBMAN  
23           JOSHUA P. GILMORE  
24           8984 Spanish Ridge Avenue  
25           Las Vegas, NV 89148

26        *Attorneys for Defendants & Counterclaimant*

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28        \_\_\_\_\_  
29        UNITED STATES MAGISTRATE JUDGE

30        March 28, 2018

31        DATED: \_\_\_\_\_